

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a
CARAFEM,**

Plaintiff,

v.

**RICKEY NELSON WILLIAMS, JR.;
BEVELYN Z. WILLIAMS, JR.;
EDMEE CHAVANNES; OPERATION
SAVE AMERICA; JASON STORMS;
CHESTER GALLAGHER; MATTHEW
BROCK; COLEMAN BOYD; FRANK
LINAM; BRENT BUCKLEY; and AJ
HURLEY;**

Defendants.

Civil Action No. _____

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Rule 65 of the Federal Rules of Civil Procedure and the Freedom of Access to Clinic Entrances Act (“FACE”), 18 U.S.C. §248, Plaintiff FemHealth USA, Inc., d/b/a carafem (hereinafter, “carafem”) moves for an ex parte emergency temporary restraining order against Defendants Rickey Nelson Williams, Jr., Bevelyn Williams, Edmee Chavannes, Operation Save America, Jason Storms, Chester Gallagher; Matthew Brock; Coleman Boyd; Frank Linam; Brent Buckley; and AJ Hurley. Plaintiff asks the Court to (1) restrain Defendants, and any representatives, agents, employees, or any others acting in concert or participation with any Defendant, from physically obstructing, intentionally intimidating, or intentionally interfering with, (or attempting to do the same) any person because that person is or has been obtaining or

providing reproductive health services from Plaintiff's facility; and (2) prohibit Defendants, and any representatives, agents, employees, or any others acting in concert or participation with any Defendant, from entering onto the property of Providence Pavilion at 5002 Crossings Circle, Mt. Juliet, TN 37122 during carafem's hours of operation as indicated on carafem's website, and during the time periods both two hours before and two hours after carafem's hours of operation.

Defendants have unlawfully obstructed the entrance of Plaintiff's facility on both July 26 and 28, 2022, and have stated their intent to continue to "terrorize [the] building" and "take this building down."

Plaintiff submits its Complaint; the Affidavits of Michelle Davidson and Pat Wheeler in Support of the Temporary Restraining Order; and the Memorandum of Law in Support of the present motion. **If the Court deems a hearing on this motion to be necessary, Plaintiff respectfully requests such hearing be set no later than the afternoon of July 29, 2022.**

Date: July 29, 2022

Respectfully submitted,

/s/ Sarah B. Miller

Sarah B. Miller

Angela L. Bergman

Allison Wiseman Acker

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